

for the

In the Matter of the Search of
A USPS Priority Mail parcel
bearing tracking number 9205 5903
3320 0030 0048 7598 70

Case No. 8:24-MJ-00132-DUTY

Printed name and title

AO 93C (Rev. 8/18) Warrant by Telephone of Other Reliable Electronic Means (Page 2)

Return

Case No.: 8:24-mj-00132-DUTY	Date and time warrant executed: 3/20/24 11:11 AM	Copy of warrant and inventory left with: USPS
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Inventory made in the presence of:

USPIS TFO Gabe Gutierrez, USPIS Sumyra Dwy.

Inventory of the property taken and name of any person(s) seized:

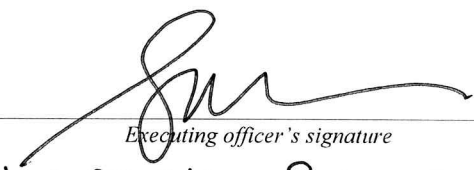
USPS # 9205 5903 3320 0030 0048 7598 70

- parcel packaging material
- approx. 1,858 ggs of packaged blue pills labeled as Alprazolam.

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: 03/20/24


 Executing officer's signature

Postal Inspector, Sumyra Dwy.

Printed name and title

AFFIDAVIT

I, Sumyra Duy, being duly sworn, declare and state as follows:

I. TRAINING AND EXPERIENCE

1. I am a United States Postal Inspector ("USPI") with the United States Postal Inspection Service ("USPIS") and have been so employed since May 2012. I am currently assigned to the Contraband Interdiction and Investigation - South Team of the Los Angeles Division, which is responsible for investigating drug trafficking violations involving the United States Mail to distribute controlled substances and/or controlled substances proceeds.

2. I have completed a twelve-week basic law enforcement training course in Potomac, Maryland, which included training in the investigation of narcotics trafficking via the United States Mail. Additionally, I have attended a 40-hour Los Angeles Police Department Peace Officer Standards and Training Certified Academy Narcotics School. Prior to becoming a USPI, I worked as a financial investigator. I hold a Bachelor of Arts degree from California State University, Fullerton in Sociology and a Master's of Advanced Study from University of California, Irvine in Criminology, Law and Society. As part of my law enforcement duties, I have conducted numerous parcel investigations that have resulted in the arrest of individuals who have received and distributed controlled substances, as well as the seizure of the controlled substances and/or the proceeds of the sales of controlled substances.

II. PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a search warrant for the SUBJECT PARCEL described below in paragraph 5 and Attachment A. The items to be seized constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance).

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. PARCEL TO BE SEARCHED

5. This affidavit is made in support of an application for a search warrant for the following United States Postal Service ("USPS") Priority Mail parcel (hereinafter referred to as the "SUBJECT PARCEL"), which is currently secured at the United States Post Office located at 615 N. Bush Street, Santa Ana, California:

a. The SUBJECT PARCEL is a USPS Priority Mail parcel bearing tracking number 9205 5903 3320 0030 0048 7598 70. The SUBJECT PARCEL is a brown-colored cardboard box weighing

approximately 17 pounds, 4 ounces and contains a pre-printed mailing label. The SUBJECT PARCEL is addressed to "LINDA COLLINS, 6700 WARNER AVE APT 8E, HUNTINGTON BEACH, CA 92647-5367". The return address listed on SUBJECT PARCEL is "LANCE ELKINS, C/O PHYSICALADDRESS.COM, SUITE 916, 1445 WOODMONTH LN NW, ATLANTA, GA 30318". The SUBJECT PARCEL has a listed shipping date of March 2, 2024.

IV. ITEMS TO BE SEIZED

6. The items to be seized from the SUBJECT PARCEL constitute fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility to Facilitate the Distribution of Controlled Substances). The items to be seized are identified in Attachment B and are incorporated herein by reference.

V. STATEMENT OF PROBABLE CAUSE

7. Based on my conversations with other law enforcement officers involved in this investigation and my review of law enforcement reports, I learned the following:

A. Background Investigation

a. On or about March 5, 2024, Newark, New Jersey Postal Inspector Evan Nadjavestky contacted me regarding a parcel destined to the address 6700 Warner Ave. Apt. 8E, Huntington Beach, California 92647. This address has been identified as being associated to an ongoing investigation involving the distribution of controlled substances.

b. As described in detail below, the SUBJECT PARCEL is an inbound parcel to the greater Los Angeles area from a different region of the United States and was selected for investigation because it met certain criteria common to packages containing contraband. The SUBJECT PARCEL is believed to contain controlled substances or the proceeds from the trafficking of controlled substances based on, among other things, a positive alert by a trained narcotics-detection canine.

8. Based on my training and discussions with experienced Postal Inspectors, I know that Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In particular, they began conducting organized interdictions of Express Mail and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances in Los Angeles, California, in the early 1990s. Along with conducting organized interdictions, Postal Inspectors also regularly examine and investigate Express Mail and Priority Mail parcels throughout the year. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances using boxes, with the proceeds in the form of cash. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual change over the years toward the current trend of smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money

orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances that lend a sense of legitimacy to the parcel.

9. From my training, personal experience, and the collective experiences related to me by Postal Inspectors on my team who specialize in investigations relating to the mailing of controlled substances and drug proceeds, I am aware that the greater Los Angeles area is a major source area for controlled substances. As such, controlled substances are frequently transported from the greater Los Angeles area via the United States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the greater Los Angeles area via the United States Mail. These proceeds are generally in large amounts of money over \$1,000.

10. I also know based on my training and experience that drug traffickers will often use one of two USPS services -- Priority Mail Express Service, which is the overnight/next day delivery mail service, and Priority Mail Service, which is the two-to-three day delivery mail service. Drug traffickers use Priority Mail Express delivery services because of their speed, reliability, and the ability to track the package's progress to the intended delivery point. Drug traffickers often use Priority Mail delivery services because they allow drug traffickers more time for travel between states if they are following their shipments to their destinations for distribution. Like Priority Mail Express, Priority Mail also

allows drug traffickers to track the package's progress to the intended delivery point.

11. Based on information derived and built upon over many years, I, like other Postal Inspectors and Task Force Officers, initially look for certain characteristics when examining Priority Mail Express and Priority Mail for controlled substances or drug proceeds. These characteristics include:

- a. The article is contained in a box, flat cardboard mailer, or Tyvek envelope;
- b. The article bears a handwritten label; and/or
- c. The handwritten label on the article does not contain a business account number.

12. Parcels found to meet these characteristics are scrutinized by Postal Inspectors through further investigation, which may include return and addressee address verifications and trained narcotics-detecting canine examination. Postal Inspectors will also look for additional drug or drug proceed parcel characteristics such as:

- a. The seams of the article are all taped or glued shut;
- b. The article emits the odor of a cleaning agent, adhesive, or spray foam, detectable by a human; and/or
- c. Multiple articles are mailed by the same individual, on the same day, from different locations.

13. Based on my training and experiences and information learned during discussions with other Postal Inspectors and Task Force Officers, I know that drug traffickers often use fictitious

or incomplete names and/or addresses in an effort to conceal their identity from law enforcement. Indeed, it is my experience that when real addresses are used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

B. Investigation Regarding the SUBJECT PARCEL

14. On March 4, 2024, Inspector Nadjavestky identified the SUBJECT PARCEL based on a review of postal business records and after being notified that the SUBJECT PARCEL had been shipped to the address listed below, which, as mentioned, is part of an ongoing investigation into drug trafficking.

15. On March 5, 2024, Inspector Nadjavestky notified me that the SUBJECT PARCEL was inbound from Atlanta, Georgia and destined to the address 6700 Warner Ave. Apt. 8E, Huntington Beach, CA 92647.

16. On March 7, 2024, I went to the post office located at 6771 Warner Ave., Huntington Beach, CA 92647 and reviewed the SUBJECT PARCEL. The SUBJECT PARCEL was identified as meeting some of the initial suspicious characteristics described above in paragraphs 11 and 12. Specifically, the SUBJECT PARCEL is a cardboard box, and all of the seams were taped shut and covered in a plastic wrap.

17. After being identified as suspicious, the SUBJECT PARCEL was removed from the mail stream for further investigation.

C. Parcel Description and CLEAR Database Check

18. On March 8, 2024, I utilized CLEAR to search for information on the listed sender and recipient. CLEAR is a public

information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

19. I searched the sender's information and learned the name "LANCE ELKINS" was not associated to the sender address "C/O PHYSICALADDRESS.COM, SUITE 916, 1445 WOODMONT LN NW, ATLANTA, GA 30318". I conducted an open-source search on this address and learned this location is a virtual mailbox address called Physicaladdress.com. PhysicalAddress.com is a cloud-based virtual mailbox provider designed to give users an easier and more convenient way to manage postal mail, packages, and documents. I searched the recipient's information and learned the recipient's name "LINDA COLLINS" was last associated to the recipient address "6700 WARNER AVE APT 8E, HUNTINGTON BEACH, CA 92647-5367" on June 15, 2023.

20. Based on my training and experience, I know private mailbox facilities, akin to Physicaladdress.com, are utilized by drug traffickers in an effort to evade detection by law enforcement.

D. Positive Canine Alert on the SUBJECT PARCEL

21. On March 7, 2024, Santa Ana Police Department Detective Gabriel Gutierrez and his narcotics-detection canine, "Poppy", conducted an exterior examination of the SUBJECT PARCEL. Det. Gutierrez informed me that Poppy gave a positive alert to the SUBJECT PARCEL, indicating the presence of drugs or other items, such as the proceeds from the sale of drugs which have been recently contaminated by or associated with the odor of drugs.

22. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, is a document setting forth information from Det. Gutierrez regarding Poppy's training and history in detecting controlled substances, and Poppy's examination of the SUBJECT PARCEL.

VI. CONCLUSION

23. Based on the above, I believe there is probable cause to believe the SUBJECT PARCEL, described in Attachment A, contains evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance), as described in Attachment B.

/s/
Sumyra Duy
United States Postal Inspector

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 18th day of
March 2024.

DOUGLAS F. McCORMICK
HONORABLE DOUGLAS F. MCCORMICK
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

PARCEL TO BE SEARCHED

This affidavit is made in support of an application for a search warrant for the following United States Postal Service Priority Mail Express parcel (hereinafter referred to as the "SUBJECT PARCEL"), which is currently secured at the United States Post Office located at 615 N. Bush Street, Santa Ana, California:

a. The SUBJECT PARCEL is a USPS Priority Mail parcel bearing tracking number 9205 5903 3320 0030 0048 7598 70. The SUBJECT PARCEL is a brown-colored cardboard box weighing approximately 17 pounds, 4 ounces and contains a pre-printed mailing label. The SUBJECT PARCEL is addressed to "LINDA COLLINS, 6700 WARNER AVE APT 8E, HUNTINGTON BEACH, CA 92647-5367". The return address listed on SUBJECT PARCEL is "LANCE ELKINS, C/O PHYSICALADDRESS.COM, SUITE 916, 1445 WOODMONTH LN NW, ATLANTA, GA 30318". The SUBJECT PARCEL has a listed shipping date of March 2, 2024.

ATTACHMENT B

ITEMS TO BE SEIZED

1. The following are the items to be seized from the SUBJECT PARCEL, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance):

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Any associated packaging.

AFFIDAVIT

**HANDLER GABRIEL GUTIERREZ
AND K9 "POPPY"**

I am currently employed by the Santa Ana Police Department, and assigned as a Detective to the Vice/Narcotics Unit. As of April 7th, 2021, I was assigned as a Narcotic Detection Canine Handler. "Poppy" who is a 3 year old female Black Labrador Retriever, was acquired by the Santa Ana Police Department on April 7th, 2021. Subsequently, I was assigned as POPPY'S full-time canine handler on this day.

POPPY and I have received training as a Narcotic Detection Canine Team by "Scenturion Canine Consulting LLC," which is located in Fontana, California. Poppy and I completed 4 weeks of formal Narcotic Detection Training taught by "Scenturion Canine Consulting LLC" from April 12, 2021 through May 6th, 2021. During that time, POPPY has been trained to detect and alert to the odors of Marijuana, Methamphetamine, Cocaine, Heroin, MDMA (Ecstasy) and their derivative. POPPY has been trained to show a "passive alert" in response to detecting any of these narcotic odors. Prior to her final alert POPPY will often make sudden change of direction towards the source of the odor, her breathing pattern will change and she may take several deep inhalations through his nose, and then appear to stop taking breaths. Also, without direction, POPPY may also jump up into and/or crawl under obstacles to get closer to the source of the odor(s). This passive alert may also indicate item(s) that may have recently been contaminated with the odor of one or more of the aforementioned narcotics for which POPPY has been trained to detect.

Also, while training at "Scenturion Canine Consulting LLC," POPPY and I completed over 400 narcotic related and "blank" sniffs. These sniffs consisted of commercial buildings, residential homes, vehicles, transport trucks, packages/parcels, luggage, and many other different types of structures and objects. During these training sessions, the "training aids" were concealed in various locations, inside and/or outside, and POPPY was used to detect and locate them. POPPY and I, have also conducted sniffs where there were no narcotics present (blanks), and POPPY did not adversely alert to these locations that were deemed blank.

On May 6th, 2021, POPPY and I passed the initial California POST certification process through "CNCA," which was conducted by a recognized CNCA Certified K9 trainer/instructor, to detect the odors of Marijuana, Methamphetamine, Cocaine, Heroin, MDMA (Ecstasy) and their derivative. It was on this day, POPPY and I became a CA POST Certified Narcotics Detection Team. On January 14, 2022, December 22, 2022 and November 7, 2023, POPPY and I re-certified as a CA POST Certified Narcotics Detection Team through "CNCA". I am also a current member of the California Narcotics Officers Association (CNOA).


During the week of June 6, 2023, Poppy was trained to detect and alert to the odor of Fentanyl and its derivatives. On June 9, 2023, Poppy and I passed the California POST certification process through "CNCA," which was conducted by a recognized CNCA Certified K9 trainer/instructor, to detect the odor of Fentanyl and its derivatives.

On March 7, 2024, my police canine and I assisted with a narcotic parcel investigation. Canine Poppy alerted to the presence of the odor of illegal narcotics emitting from the following parcel.

USPS Parcel: 9205 5903 3320 0030 0048 7598 70

Addressed To: Linda Collins

6700 Warner Ave. Apt. 8E, v
Huntington Beach, CA 92647



Detective Corporal G. Gutierrez #3252
Santa Ana PD